

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

NATALIE VALLECORSA, )  
Plaintiff, ) Case No. 2:19-cv-1495  
vs. ) Honorable J. Nicholas Ranjan  
ALLEGHENY COUNTY, et al., )  
Defendants. ) **JURY TRIAL DEMANDED**

**JOINT STIPULATION OF FACTS**

The Parties in the above-captioned matter, by and through their respective counsel, file the instant Joint Stipulation of Facts, as follows:

1. Plaintiff, Natalie Vallecorsa, was hired by Allegheny County as a part-time telecommunications officer (TCO") for the Allegheny County Emergency Services Department on November 17, 2014.
2. Plaintiff, Natalie Vallecorsa, was transferred from a part-time TCO to a full-time TCO for the Allegheny County Emergency Services Department on September 6, 2015.
3. On June 19, 2018, Antwon Rose, Jr., a 17-year-old Black man, was shot and killed by a White police officer in East Pittsburgh while fleeing a traffic stop.
4. The shooting sparked protests and public demonstrations throughout the city of Pittsburgh and was the subject of local and national news coverage.
5. On or about June 24, 2018, Plaintiff engaged in the attached Facebook exchange, attached as Exhibit A.
6. On June 27, 2018, Plaintiff was terminated from her employment with Allegheny County.

7. At the time of her termination, Plaintiff's gross hourly rate of pay at the time of termination was \$23.44.
8. At the time of her termination, Plaintiff's gross monthly rate of pay at the time of termination was \$4,063.31.
9. At the time of her termination, Plaintiff's gross annual rate of pay at the time of termination was \$48,747.71.
10. The parties reserve the right to amend or supplement this stipulation.

Respectfully submitted,

ORIE & ZIVIC

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